

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA,

Plaintiff,

v.

COMMONWEALTH OF PUERTO RICO,
et al.,

Defendants.

CIVIL NO. 12-2039 (GAG)

MOTION TO RESTRICT

TO THE HONORABLE COURT:

COME NOW Defendants Commonwealth of Puerto Rico and Puerto Rico Police Bureau (“PRPB”), by and through the undersigned counsel, and move the Court for leave to file their *Joint Notice of Action Pursuant to Paragraph 284 of the Agreement for the Sustainable Reform of the Puerto Rico Police Department* as a selected parties document, as it contains sensitive information regarding the reform process and the tactical operations of the PRPB the confidentiality of which outweighs the presumption of public access to court documents.

WHEREFORE, Defendants respectfully requests that the Honorable Court allow the filing of their *Notice of Action* as selected parties document.

WE HEREBY CERTIFY: That today we have electronically filed the foregoing document with the Clerk of the Court for the District of Puerto Rico, using the CM/ECF system which will send a copy and notification of filing to all counsel of record.

RESPECTFULLY SUBMITTED in San Juan, Puerto Rico on July 17, 2019.

For Defendants COMMONWEALTH OF
PUERTO RICO, ET AL.:

s/Maria A. Dominguez
Maria A. Dominguez
USDC-PR No. 210908
madt@mcvpr.com

s/Arturo J. Garcia Sola
Arturo J. Garcia Sola
USDC-PR No. 201903
ajg@mcvpr.com

s/Lizzie M. Portela
Lizzie M. Portela
USDC-PR No. 208401
lpf@mcvpr.com

s/Javier F. Micheo Marcial
Javier F. Micheo Marcial
USDC-PR No. 305310
jfmm@mcvpr.com
McCONNELL VALDÉS LLC
P.O. Box 364225
San Juan, PR 00936-4225
Telephone (787) 250-5641
Fax: (787) 759-8282

Attorneys for Defendants